

REMARKS

The Applicant respectfully submits this *Amendment And Request For Reconsideration* in response to the Office Action of 27 March 2008 for the above-referenced patent application.

In the present *Amendment*, claims 23-31 have been canceled; no claims have been amended or added. The Applicant respectfully requests entry of the amendment and reconsideration of the remaining claims based on the reasons presented herein.

In the Office Action mailed on 27 March 2008, the Examiner rejected claims 1-28 under 35 U.S.C. § 102(b) as being anticipated by Jin (U.S. Patent Application Publication No. US2002/0084888A1). In addition, the Examiner rejected dependent claims 9, 19, 21, and 28 under 35 U.S.C. § 103(a) as being obvious over Jin in view of Minborg (U.S. Patent No. 6,977,909). In response, the Applicant respectfully disagrees with the Examiner's rejections and submits that all pending claims 1-22 are allowable over the prior art for at least the following reasons. In order to reduce the issues for expediting allowance of the application, the Applicant has canceled claims 23-31 for subsequent presentation in a continuation application.

In order for claims to be properly rejected under 35 U.S.C. § 102(b) and § 103(a), the prior art in combination must teach or suggest each and every limitation of the claims. In the present case, the art relied upon by the Examiner fails to teach or suggest each and every limitation of the claims.

In particular, the relied upon art fails to teach or suggest the acts of "reading," "storing," and "repeating" which are performed

"automatically" ... "in response to a trigger signal" as claimed in claims 1-22.

The Applicants submit that the Examiner is not interpreting claims 1-22 in a reasonable fashion and/or is mischaracterizing the teachings of the relied upon art. The Examiner must interpret the claims broadly – but only as broadly as is reasonable. To interpret the claims in a different way, other than as presented as understood by those ordinarily skilled in the art, would be unreasonable.

To help illustrate, the Applicants list method claim 1 below. Method claim 1 recites:

1. In a mobile station, a method of automatically grouping user-specific information items comprising the acts of:
 - in response to a trigger signal, automatically grouping the user-specific information items by a processor of the mobile station by:
 - reading a first user-specific information item from a first file of the mobile station;
 - storing the first user-specific information item in a user information file or a message of the mobile station;
 - and
 - repeating the acts of reading and storing for at least a second user-specific information item from a second file of the mobile station, so that the first and the second user-specific information items are grouped together as user information in the user information file or the message of the mobile station.

As apparent, the recited acts of "reading," "storing," and "repeating" are *indented* to the right of the "automatically grouping" recitation – all of which are performed "in response to a trigger signal." Thus, the claims have been formatted and otherwise fashioned so that the acts of "reading," "storing," and "repeating" *structurally* fall under the purview of

the single triggering act. Proper interpretation thus requires that the acts of "reading" and "storing" of a first user-specific information item, as well as the acts of "reading" and "storing" again (i.e. the repeating act) of a second user-specific information item, are performed in response to the *single* trigger signal in the automatic grouping of user-specific information items.

In the Jin reference, a system for sending and receiving personal information using a mobile terminal is generally described. A personal information is sent using a short message service with an attached identification information. This involves setting the mobile terminal to a personal information sending mode, and inputting personal information data by the user for transmission. As apparent, the Jin reference requires the user to manually enter the multiple user information items through a single application for storage.

Thus, the relied upon art fails to teach or suggest an automatic mobile station grouping of multiple items from different files into the same central file or message in response to a single trigger signal. In the Jin reference, different data are inserted by the user in a manual fashion via the same application and file, for use in an SMS message. Such conventional technique may be viewed in contrast to techniques of the present disclosure, where a processor of a mobile station is adapted to provide an "automatic" grouping of data items from already-existing, disparate files and locations, and store such items in the same central user information file or message, in response to a single trigger signal. The present techniques take advantage of the fact that user-specific information items are already present and stored in the mobile station in different files and applications, and therefore require no excessive data inputting by the user to achieve the desired results.

The Examiner's references to the Jin reference illustrate the deficiencies of the relied upon art. For the alleged teaching of the claimed "in response to a trigger signal, automatically grouping" step, the Examiner recites to paragraph 31 of the Jin reference. In paragraph 31 of the Jin reference, it is taught that the user inputs the phone number of the receiving mobile terminal to which the user wants to transmit the personal information. It is further taught that the user can either input this phone number manually or automatically. Apparently, the Examiner alleges that the user inputting of the phone number of the receiving mobile terminal is the "trigger signal" which causes some "automatic grouping."

However, the Applicants respectfully disagree with the Examiner's characterization and assessment above. If the user input of the phone number of the receiving mobile terminal in the Jin reference were to be treated as a "trigger signal", then there would only be a single set – not two sets - of "reading" and "storing" actions that would occur subsequently in response to the alleged trigger signal (i.e. the previous data has already been entered by the user, prior to the alleged trigger signal). In the present claims, the acts of "reading," "storing," and "repeating" (i.e. repeating the reading and storing for a second item) are performed in response to the trigger signal. Thus, the Examiner's argument with respect to the Jin reference fails.

As another example, for the alleged teaching of the claimed "[first] reading" step, the Examiner recites to FIGs. 4a-4f of the Jin reference. In FIGs. 4a-4f of the Jin reference, the manual inputting process for data by the user is illustrated. The manual user data entry of FIGs. 4a-4f, however, cannot be treated as the "[first] reading" step as the Examiner alleges. If the manual user data entry of FIGs. 4a-4f were to be treated as the "[first] reading" step, then the Examiner cannot also argue that the user

inputting of the phone number of the receiving mobile terminal (see paragraph 31 of the Jin reference) is the alleged trigger signal. The reason is because the user inputting of the phone number occurs *after* the manual inputting process of the data by the user. It is difficult to understand how a trigger signal which causes an alleged multi-step automatic grouping process could come after the automatic grouping process. It is also unreasonable to construe the present claims such that a trigger signal that causes the automatic grouping of items comes after the automatic grouping. Again, in the present claims, the acts of "reading," "storing," and "repeating" (i.e. repeating the reading and storing steps for a second item) are performed in response to the same trigger signal. Thus, the Examiner's argument with respect to the Jin reference fails again.

As even another example, for the alleged teaching of the claimed "the trigger signal [being] produced in response to a user input request for the user information" (see e.g. dependent claims 10 and 20), the Examiner makes reference to paragraph 42 of the Jin reference and states that "the command 'confirm' icon do the act of reading, storing, and repeating." Again, if the manual user data entry of the Jin reference were to be treated as the trigger signal, then the Examiner cannot also argue that the user inputting of the phone number of the receiving mobile terminal (see paragraph 31 of the Jin reference) is the alleged trigger signal. Again, in the present claims, the acts of "reading," "storing," and "repeating" are performed in response to the same trigger signal.

Using techniques of the prior art, if any user-specific information needed to be changed (e.g. when a new or updated e-mail address of the user is provided), the user would have to manually change the central file in addition to changing his/her email account information in the e-mail

communication application. According to an embodiment of the present disclosure, however, the user would merely need to change his/her e-mail account information in the e-mail communication application – thereafter, the inventive technique would sometime automatically update the user information item(s) from the existing files/application(s) which includes the e-mail communication application.

Thus, according to the present techniques, methods and apparatus for use in *automatically* grouping user-specific information items are provided in a mobile station. A processor of the mobile station is adapted to automatically group user-specific information items in response to identifying a trigger signal. The automatic grouping of user-specific information items involves the following acts. A first user-specific information item is read from a first file of the mobile station, and the first user-specific information item is stored in a central user information file or a message of the mobile station. The acts of reading and storing are then *repeated* for at least a second user-specific information item from a second file of the mobile station, so that the first and the second user-specific information items are grouped together as user information in the central user information file or the message of the mobile station.

As the prior art relied upon by the Examiner fails to teach or suggest an automatic grouping of user-specific information items by a processor of a mobile station in response to a trigger signal, as carried out in the specifically-recited acts, the rejections should be withdrawn and the claims allowed. Other reasons for allowability of both the independent and dependent claims are apparent to those skilled in the art, but are not detailed herein due to the already-indicated reasons for allowability.

Based on the reasons presented herein, the Applicants respectfully request the Examiner to withdraw the rejections of pending claims 1-22. The Applicants submit that the application as amended is in a condition suitable for allowance.

Respectfully submitted,

/John J. Oskorep/

Date: 26 June 2008

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